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**REMARKS**

Claims 1-24, 26-30 are currently pending in the subject application and are presently under consideration. Claim 25 has been cancelled, and claims 17 and 29 have been amended to cure minor informalities – such amendments are solely for clarification purposes and do not narrow the scope of the claims. All pending claims with status identifiers are listed at pages 2-12.

Applicants' representative acknowledges with appreciation the Examiner's indication that claims 17 and 19 would be allowable if recast in independent form to recite all limitations of respective base claims and any intervening claims. However, it is believed such amendments are not necessary in view of the deficiencies (discussed *infra*) of the cited art *vis a vis* applicants' claimed invention.

Favorable reconsideration of the subject application is respectfully requested in view of the comments and amendments herein.

**I. Objection of Claim 25 Under 37 C.F.R. §1.75(c)**

Claim 25 stands objected to under 37 C.F.R. §1.75(c) as being of improper dependent form for failing to further limit the subject matter of a previous claim. Claim 25 has been cancelled herein. Accordingly, this objection is now moot and should be withdrawn.

**II. Rejection of Claims 3-15, 22, 23, and 29 under 35 U.S.C. §112**

Claims 3-15, 22, 23, and 29 stand rejected under 35 U.S.C. §112 as being indefinite. Claim 29 has been amended herein to cure minor informalities cited by the Examiner. It is respectfully submitted that this rejection should be withdrawn for at least the following reason. The term "loop" as employed by the applicants is not repugnant to an alternative meaning of the term "loop" as used in the art.

The term "loop" when employed as a verb means to "move in loops or in an arc," *Merriam-Webster Dictionary*, <http://www.m-w.com/cgi-bin/dictionary>. The specification at page 12 lines 7-11 states that "a source loop path node may be used in a subsequent code generation pass... as the point around which the generated code will... loop." The verb "loop" found at the end of such sentence is referring to the term "source loop path

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node,” thus rendering the two consistent. A “loop point” is defined in the specification at page 12 lines 17-18 as “a source tree node for which maxoccurs = \*.” The highest-level “loop point” (e.g., a loop point furthest away from its root node) becomes the “source loop path node,” and thus generated code will “loop” around that particular node. In view of the foregoing, it is respectfully submitted that the term “loop” is employed in the subject claims consistently within the accepted meaning of such term, and thus this rejection should be withdrawn.

**III. Rejection of Claims 1, 20, 21, 23, 25, 26, 29 and 30 Under 35 U.S.C. § 102(b)**

Claims 1, 20, 21, 23, 25, 26, 29, and 30 stand rejected under 35 U.S.C. §102(b) as being anticipated by Greger Linden, “Structured Document Transformations,” 1997, University of Helsinki, Finland, Series of Publications A, Report A-1997-2 (Linden). Withdrawal of this rejection is respectfully requested for at least the following reasons. Linden neither discloses nor suggests each and every element of applicants’ invention as recited in the subject claims.

For a prior art reference to anticipate, 35 U.S.C. § 102 requires that “each and every element as set forth in the claim is found, either expressly or inherently, described, in a single prior art reference.” *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (*quoting Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

In particular, Linden does not disclose or suggest *determining* source node dependencies for a target node by tracing from the target node through the mapping to the source schema, matching hierarchy by *generating a hierarchy match list* for the target node, or generating code according to the *hierarchy match list* as recited in the subject claims.

Rather, Linden teaches generating code to facilitate transformation of a source document of one type (e.g., grammar) into a target document of another type by utilizing a tree-tree grammars method (TT-grammars method). The TT-grammars method parses a source document of known type and creates a source tree. A target grammar is then parsed as well, and a tree template for the target document is created based on the source

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tree and the parsed grammar of the target document. Thus, when utilizing the TT-grammars method, source node dependencies and hierarchy matching between source nodes and target nodes occurs at initial creation of the target tree and cannot be modified regardless of whether a user would prefer a separate mapping. *See Mapping Specification* at p. 49. In contrast, applicants' claimed invention determines node dependencies and/or generates a hierarchy match list *after* the mapping has been created. Source node dependencies for the target node are then determined by tracing from the target node back through the mapping to the source schema. Likewise, a hierarchy match list is created after the mapping has been selected. Thus, in accordance with applicants' claimed invention, a user can define mapping(s) and schema transformation and generate code capable of handling information transfers (*e.g.*, business and/or application boundaries) without having extensive knowledge of particular programming languages.

In view of the foregoing, it is respectfully submitted that Linden neither anticipates nor suggests applicants' invention as recited in independent claims 1, 20, 29 and 30 (and claims 21, 23, 25 and 26 which respectively depend there from), and this rejection should be withdrawn.

#### **IV. Rejection of Claims 2 and 16 Under 35 U.S.C. § 103(a)**

Claims 2 and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Linden in view of Alfred V. Aho, *et al*, "Compilers: Principles, Techniques, and Tools," 1986, Addison Wesley (Aho, *et al*). Withdrawal of this rejection is respectfully requested for at least the following reasons. Claims 2 and 16 depend from independent claim 1. Aho, *et al*. does not make up for the aforementioned deficiencies of Linden with respect to independent claim 1. Therefore, this rejection should be withdrawn.

09/607,560MS147163.1**V. Rejection of Claims 18 and 28 Under 35 U.S.C. § 103(a)**

Claims 18 and 28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Linden in view of Alberto Bellina, "XmlTool documentation," 21 January 2003 (Bellina). Withdrawal of this rejection is respectfully requested for at least the following reasons. Claims 18 and 28 respectively depend from independent claims 1 and 20. Bellina does not make up for the aforementioned deficiencies of Linden with respect to claims 1 and 20. Therefore, this rejection should be withdrawn.

**VI. Rejection of Claim 27 Under 35 U.S.C. § 103(a)**

Claim 27 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Linden. Withdrawal of this rejection is respectfully requested for at least the aforementioned deficiencies of Linden with respect to independent claim 20 (from which the subject claim depends).

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**VII. Conclusion**

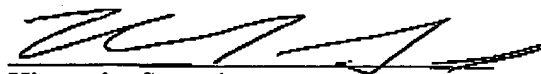
The present application is believed to be condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

AMIN & TUROCY, LLP



Himanshu S. Amin

Reg. No. 40,894

AMIN & TUROCY, LLP  
24<sup>TH</sup> Floor, National City Center  
1900 E. 9<sup>TH</sup> Street  
Cleveland, Ohio 44114  
Telephone (216) 696-8730  
Facsimile (216) 696-8731